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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR No. 07-0454 PJH
	)	
Plaintiff,	)	
	)	
v.	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
	)	EXCLUDING TIME FROM JANUARY 23,
	)	2008 THROUGH FEBRUARY 20, 2008
SHANNON BLAYLOCK,	)	
aka ARLANDYS RICHARDSON,	)	
aka "DADDY RICH",	)	
TAWAKONI SEATON,	)	
aka TONI,	)	
	)	
Defendants.	)	
	)	
	)	

On January 23, 2008, the parties in this case appeared before the Court. Counsel for the United States and counsel for co-defendants Blaylock and Seaton stipulated that the case is a complex case under 18 U.S.C. § 3161(h)(8)(B)(ii). These parties also stipulated that time should be excluded from the Speedy Trial Act calculations from January 23, 2008 through February 20, 2008. These parties represented that granting the continuance was necessary for effective preparation of counsel, taking into account the exercise of due diligence, to afford counsel time to review discovery. See 18 U.S.C. § 3161(h)(8)(B)(iv). Counsel for co-defendant Gardner

1 objected to the exclusion of time on all grounds.

2 SO STIPULATED:

3  
4 JOSEPH P. RUSSONIELLO  
United States Attorney

5  
6 DATED: April 30, 2008

7 /s/ Denise Barton  
8 DENISE MARIE BARTON  
Assistant United States Attorney

9 DATED: April 30, 2008

10 /s/  
11 MICHAEL STEPANIAN  
Attorney for SHANNON BLAYLOCK

12 DATED: April 30, 2008

13 /s/  
14 KENNETH WINE  
Attorney for TAWAKONI SEATON

15 **[Proposed] Order**

16 As the Court found on January 23, 2008 and for the reasons stated above, the Court finds that  
17 the ends of justice served by the continuance outweigh the best interests of the public and the  
18 defendants in a speedy trial and that time should be excluded from the Speedy Trial Act  
19 calculations from January 23, 2008 through February 20, 2008 for effective preparation of  
20 counsel and due to the complexity of the case. See 18 U.S.C. §3161 (h)(8)(A). The failure to  
21 grant the requested continuance would deny counsel reasonable time necessary for effective  
22 preparation of counsel, taking into account the exercise of due diligence, and would result in a  
23 miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

24 SO ORDERED.

25  
26 DATED: 5/1/08

27 HONORABLE P.  
United States Dist

